

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

COMBINED SELECTION GROUP, LTD.	)	
	)	
Plaintiff,	)	Case No. 23-cv-02312
	)	
v.	)	Hon. John F. Kness
	)	
IFS NORTH AMERICA, INC.,	)	Mag. Judge. Gabriel A. Fuentes
	)	
Defendant.	)	

**SUPPLEMENTAL JOINT STATUS REPORT**

This Supplemental Joint Status Report is submitted by the Parties to follow up on the Minute entry from the Honorable Gabriel A. Fuentes. (Doc. 29). The Parties have again conferred on April 9, 2024. The parties inform the Court as follows:

**I. Consent to the Magistrate**

- A. Have counsel informed their respective clients about the possibility of proceeding before the assigned Magistrate Judge for all purposes, including trial and entry of final judgment? Do all parties unanimously consent to that procedure? The Court strongly encourages parties to consent to the jurisdiction of the Magistrate Judge.**

The parties **DO** consent to proceed before the Magistrate Judge at this time

**II. Cross-Motions for Summary Judgment Scheduling and Discovery**

- A. The Parties anticipate filing cross-motions for summary judgment simultaneously. The Parties Propose the following briefing schedule:**

1. Briefs in Support of Summary Judgment: June 15, 2024
2. Responses in Opposition to Summary Judgment: July 15, 2015
3. Replies in Support of Summary Judgment: August 5, 2025

This proposed schedule will accommodate deposition transcript availability and review as well as demands of other pending matters.

Respectfully submitted,

COMBINED SELECTION GROUP, LTD.

/s/ Thomas J. Dillon

One of the attorneys for the plaintiff,  
Combined Selection Group, Ltd.

Thomas J. Dillon (ARDC #3124223)  
Kyle T. Dillon (ARDC #6323818)  
MCFADDEN & DILLON, P.C.  
120 South LaSalle Street, Suite 1920  
Chicago, Illinois 60603  
(312) 201-8300  
[k.dillon@mcidillaw.com](mailto:k.dillon@mcidillaw.com)

/s/ Ross M. Good

One of the attorneys for Defendant,  
IFS NORTH AMERICA, INC.

Ross M. Good, Esq.  
David A. Eisenberg, Esq.  
LOFTUS & EISENBERG, LTD.  
161 N. Clark, Suite 1600  
Chicago, Illinois 60601  
T: 312.899.6625  
[ross@loftusandeisenberg.com](mailto:ross@loftusandeisenberg.com)